

FEB 12 2008

510(k) Summary  
(As required by 21 CFR 807.92(a))

A. Submitter Information

Inviro Medical  
1755 North Brown Road  
Suite 150  
Lawrenceville, GA 30043

Phone Number: 678-405-4031  
Fax Number: 678-405-4044  
Contact: Jim Barley  
Director RA/QA

Trade Name: InviroLink/InviroLink w/EZ Wings  
Cannula

B. Device Information

Trade/Proprietary Name: InviroLink/InviroLink w/EZ  
Wings Plastic Cannula

Common name of device: Syringe Cannula

Classification Name: Set, I.V. Fluid Transfer

Product Code: 80 LHI

Regulatory Class: II

Classification Number: 880.5440

Reason for 510(k): New Device

C. Predicate Device: Alaris Medical Systems, Inc.  
Single Dose Dispensing Pin

Predicate 510(k) #: K013087

Predicate product code: LHI

D. Device Description

The InviroLink/InviroTip Plastic Cannula were designed to replace hypodermic needles currently for withdrawal of medication from rubber-stoppered vials or injection into I.V. Systems and pre-slit septums covering injection sites.

The family of InviroLink Plastic Cannulas are 18 gauge equivalent plastic cannulas for penetrating medicine vials and dispensing medications or for injection into I.V. Systems and for use in pre-slit septums covering injection sites. Following is a list of the InviroLink Plastic Cannulas:

1. InviroLink, Model # 130001
2. InviroLink with EZ wings, Model # 130501

The InviroLink Plastic Cannulas are used in conjunction with a syringe to penetrate rubber-stopered medicine vials and pre-slit septums covering injection sites. The cannula is pre-lubricated to reduce septum insertion forces. The devices are individually packaged and are provided sterile and are labeled as single use.

E. Statement of Indications for Use

The InviroLink and InviroLink w/EZ Wings Plastic Cannulas are used in conjunction with a syringe as an additive device for aspiration from multi-dose medicine vials or injection into I.V. Systems and pre-slit septums covering injection sites.

F. Comparison of Required Technological Characteristics:

Information was submitted to demonstrate that there are no significant differences in technological characteristics between the InviroLink and InviroLink w/EZ Wings Plastic cannulas and the cited predicate device.

G. Summary and Conclusion of Nonclinical and Clinical Tests:

The InviroLink/InviroLink w/EZ Wings Plastic Cannulas met the following product/performance requirements:

A visual inspection of the device showed that the surface of the device was smooth and without oil contamination or extraneous matter or other defects. The lubricant on the cannula was invisible and the device was free of flash and burrs.

The color of each cannula and cap met the product requirement.

Dimensional – All components of the InviroLink and InviroLink w/EZ Wings met the dimensional, visual and functional requirements listed on the part/assembly drawing.

Functional – The InviroLink and InviroLink w/EZ Wings met the requirements for Cap Pull off Force, InviroLink/Syringe interface, penetration, bending and tip breaking Forces and flow rate.

Interface – The interfaces between the InviroLink and the medicine vial stopper and the InviroLink and the syringe luer lock fitting were secure and able to withstand 330 kPa of pressure for 30 seconds without leakage.



FEB 12 2008

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Mr. James Barley  
Director, of Regulatory Affairs/Quality Assurance  
Inviro Medical Devices, Incorporated  
3235 Satellite Boulevard  
Building 400, Suite 300  
Duluth, Georgia 30096

Re: K071307

Trade/Device Name: InviroLink and InviroLink w/EZ Wings Plastic Cannula  
Regulation Number: 880.5440  
Regulation Name: Intravascular Administration Set  
Regulatory Class: II  
Product Code: LHI  
Dated: January 17, 2008  
Received: February 5, 2008

Dear Mr. James Barley:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address: <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Chiu Lin', with a stylized flourish at the end.

Chiu Lin, Ph.D.

Director

Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices

Office of Device Evaluation

Center for Devices and  
Radiological Health

Enclosure

## Indications For Use

510(k) Number (if known): K071307

Device Name:

Indications For Use:

The InviroLink and InviroLink w/EZ Wings Plastic Cannulas are used in conjunction with a syringe as an additive device for aspiration from multi-dose medicine vials or injection into I.V. Systems and pre-slit septums covering injection sites.

Prescription Use X  
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

---

Concurrence of CDRH, Office of Device Evaluation (ODE)

Anthony D. ...

(Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

510(k) Number: K071307